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*Attorneys for First Solar, Inc.
and Willow Springs Solar 3, LLC*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

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|---|---|
| In re: PG&E CORPORATION -and- PACIFIC GAS AND ELECTRIC COMPANY, Debtors. | Bankruptcy Case No. 19 - 30088 (DM) Chapter 11 (Lead Case) (<i>Jointly Administered</i>) NOTICE OF HEARING FOR (I) MOTION AND MEMORANDUM OF FIRST SOLAR, INC., FOR ENTRY OF AN ORDER CONFIRMING SAFE HARBOR PROTECTION UNDER 11 U.S.C. §§ 362(b)(6) AND 556; AND (II) MOTION TO FILE UNDER SEAL |
| <input type="checkbox"/> Affects PG&E Corporation <input checked="" type="checkbox"/> Affects Pacific Gas and Electric Company <input type="checkbox"/> Affects both Debtors <i>* All papers shall be filed in the Lead Case, No. 19-30088 (DM)</i> | Hearing Date: August 28, 2019 Time: 9:30 a.m. (P.T.) Courtroom: Hon. Dennis Montali 450 Golden Gate Avenue 16th Floor, Courtroom 17 San Francisco, CA 94102 Objections Due: August 21, 2019, 4:00 (P.T.) |

1 **PLEASE TAKE NOTICE** that First Solar, Inc. (“First Solar”) has filed a motion to confirm
2 safe harbor protection under 11 U.S.C. §§ 362(b)(6) and 556 (the “Safe Harbor Motion”) [Docket No.
3 3194], and a motion to file certain contracts and related filings under seal (the “Seal Motion,” and
4 together with the Safe Harbor Motion, the “Motions”) [Docket No. 3196].

5 **PLEASE TAKE FURTHER NOTICE** that the Motions are each based on the Memorandum
6 of Points and Authorities annexed thereto, the complete files and records of the referenced matters,
7 the arguments of counsel, and such other and further matters as this Court may consider at or before
8 any hearing on the Motions.

9 **PLEASE TAKE FURTHER NOTICE** that the Motions are set for hearing on **August 28,**
10 **2019 at 9:30 a.m. (P.T.)** before the Honorable Dennis Montali at the United States Bankruptcy Court
11 for the Northern District of California, San Francisco Division, located at 450 Golden Gate Avenue,
12 16th Floor, Courtroom 17, San Francisco, CA 94102.

13 **PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motions shall
14 be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy
15 Rules for the Northern District of California, shall be filed with the Bankruptcy Court in accordance
16 with the customary practices of the Bankruptcy Court, and shall be served in accordance with the
17 *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on
18 May 14, 2019 [Docket No. 1996], including, without limitation, on (i) the Chambers of the Honorable
19 Judge Dennis Montali, United States Bankruptcy Court for the Northern District of California, 450
20 Golden Gate Ave, 16th Floor, Courtroom 17, San Francisco, CA 94102; (ii) counsel for the Debtors,
21 Weil, Gotshal & Manges, 767 Fifth Avenue, New York, NY 10153-0119, Attn: Stephen Karotkin,
22 Jessica Liou and Matthew Goren, and Keller & Benvenuti LLP, 650 California Street, Suite 1900,
23 San Francisco, CA 94108, Attn: Tobias S. Keller, Jane Kim; (iii) the Office of the United States
24 Trustee, 450 Golden Gate Avenue, 5th Floor, Suite #05-0153, San Francisco, CA, 94102, Attn: James
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1 L. Snyder, Timothy Laffredi; (iv) counsel for the Official Committee of Unsecured Creditors,
2 Milbank, LLP, 55 Hudson Yards, New York, NY 10001-2163, Attn: Dennis F. Dunne and Samuel A.
3 Khalil, and, Milbank, LLP, 2029 Century Park East, 33rd Floor, Los Angeles, CA 90067, Attn: Paul
4 S. Aronzon, Gregory A. Bray, Thomas R. Kreller; (v) proposed counsel for Official Committee of
5 Tort Claimants, Baker & Hostetler, LLP, 11601 Wilshire Blvd., Suite 1400, Los Angeles, CA 90025-
6 0509, Attn: Eric. E. Sagerman and Lauren T. Attard, and Baker & Hostetler, LLP, 1160 Battery Street,
7 Suite 100, San Francisco, CA 94111, Attn: Robert A. Julian, Cecily A. Dumas; (vi) counsel for First
8 Solar, Winston & Strawn LLP, Attn: David Neier, 200 Park Avenue, 40th Floor, New York, NY
9 10166-4193 and Jennifer Machlin Cecil, Winston & Strawn LLP, 101 California Street, 35th Floor,
10 San Francisco, CA 94111-5840; and (vii) all parties requesting notice in these chapter 11 cases
11 pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure, so as to be so filed or received
12 no later than **August 21, 2019, at 4:00 p.m. (P.T.)**.

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15 **PLEASE TAKE FURTHER NOTICE** that failure to properly file and serve an opposition
16 may be deemed consent to the relief requested in the Motions or a waiver of any right to oppose it.

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18 Dated: July 25, 2019

WINSTON & STRAWN LLP

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20 By: /s/ Jennifer Machlin Cecil
Jennifer Machlin Cecil (SBN#294806)
David Neier (*admitted pro hac vice*)

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22 *Attorneys for First Solar, Inc.*
23 *and Willow Springs Solar 3, LLC*
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